ROCKY FLATS
ENVIRONMENTAL RESTORATION UPDATE

EG&G

A PERIODIC UPDATE ON ROCKY FLATS CLEANUP • SEPTEMBER 1992

Report on Transition Submitted to Congress

Building-by-Building Cleanup

The transition process will involve all 436 buildings at the plant. However, because many of these buildings provided general support functions, they are not known to be contaminated and will probably require nothing further than administrative transfer and documentation of their condition.

Areas that may have been contaminated by previous activities in other buildings will be remediated as set forth in applicable environmental regulations. Transition activities include describing current conditions; cataloguing and removing equipment, materials, and wastes; consolidating plutonium and other nuclear materials; and cleanup to a point where the buildings can be put to other uses.

For each building, the process will generally range from 1 to 3 years, with the overall plant cleanup expected to last beyond the next decade. Cleanup activities must take into consideration the interdependence of RFP programs, such as the dual missions of disposing of special nuclear materials and maintaining production-contingency readiness. In addition, the plant must meet other requirements related to waste management, environmental restoration, safety, security, and the maintenance of numerous support services and facilities, such as roads, water supply, sewage treatment, and medical facilities.

O[illegible] 1992 the Rocky Flats Plant [illegible] to Congress that summarizes [illegible] President Bush [illegible] Admiral Watkins [illegible] [illegible] operations [illegible] maintain [illegible] [illegible]

Socio-Economic Issues

RFP currently employs about 8,300 people and generates an additional 19,000 jobs in the region through the purchase of goods and services both by the plant and its employees. RFP is also located in a populated area, with some two million potentially-impacted people living within 50 miles of the plant. In planning the plant's transition, the issue of job losses must be examined.

DOE's ultimate goal for the future of RFP is environmental restoration and economic development to minimize socio-economic impacts. The aim is to identify and develop opportunities for RFP staff to remain productively employed (not necessarily at RFP) and to make use of existing high-tech facilities for commercial or industrial development.

Plans for the Workforce

In spite of DOE's efforts to retain RFP employees or place them in positions at other DOE sites, the plant's change in mission is likely to necessitate some layoffs. DOE is working with local communities to minimize the effects of any such reductions. Possible measures to achieve this goal include the following:

- incentives for voluntary retirement;
- training for displaced and re-assigned employees;
- outplacement assistance;
- protection of health-care benefits; and
- health monitoring.

The end result of the transition will be decontamination, dismantlement of many RFP facilities, and, finally, removal from service. The next step would involve transfer for alternative uses, which may be used by private industries, other DOE operations, or other government agencies.

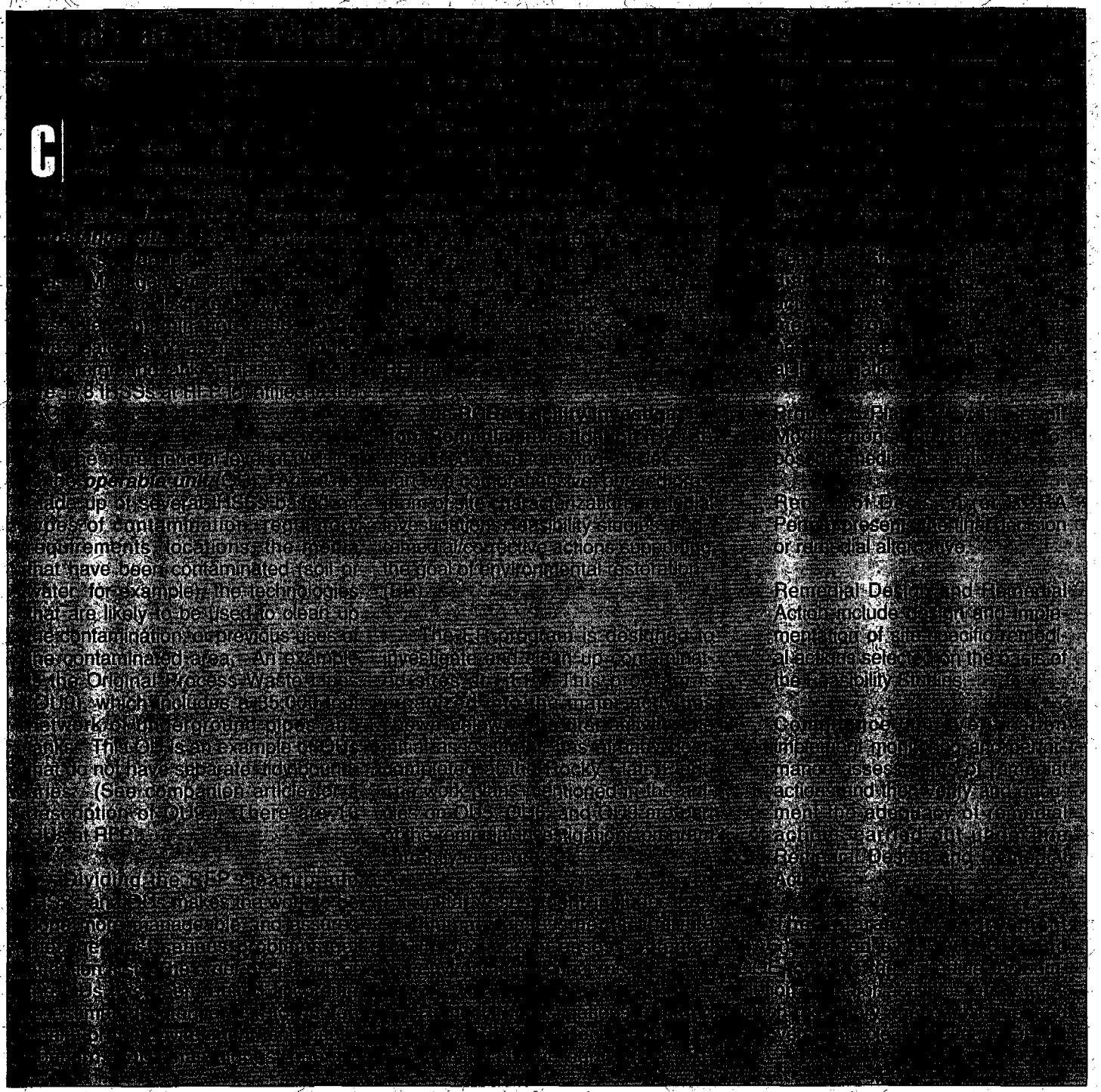
One issue not covered in the report to Congress is that of the potential liability on the part of future users or owners of land at Rocky Flats. This issue must be considered before any alternative uses are established.

A public information meeting on the RFP Transition Report to Congress was held on September 16 in Westminster. The report is available for public review in the Reading Rooms listed on page 6. ■

ADMIN RECORD

DOCUMENT CLASSIFICATION REVIEW WAIVER PER CLASSIFICATION OFFICE

A-OU12-000076



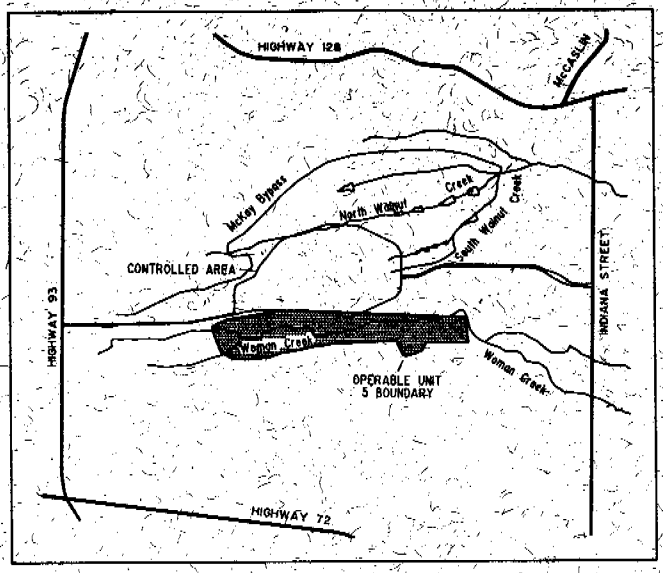
IAG Schedule Revision Possible

Almost two years have passed since the Interagency Agreement (IAG) was signed among EPA, CDH, and DOE. The IAG establishes a procedural framework and schedule through which response actions are developed, implemented, and monitored in accordance with CERCLA, RCRA, and the Colorado Hazardous Waste Act. It clarifies the roles of EPA, CDH, and DOE; coordinates oversight efforts and corrective actions; standardizes requirements; and ensures compliance with orders and permits. The IAG specifies delivery of major reports, project management activities, and milestones, and also outlines community involvement and decision-making responsibilities.

When the IAG was signed in January 1991, some basic assumptions and projections were made on timing and expense for remediating the 16 OUs at RFP. Based on progress to date and up-to-date data, DOE believes that a modified schedule for the IAG would reflect more current assumptions regarding the environmental restoration work yet to be undertaken at RFP. Consequently, DOE has asked EPA and CDH to consider changing the IAG schedule. After DOE has provided explanations for why it considers schedule changes necessary, EPA and CDH will evaluate the proposal. ■

Field Sampling Activities Begun on Woman and Walnut Creek Areas

The Rocky Flats Plant recently began field surveying activities at the Woman Creek drainage area (OU5), and the Walnut Creek drainage area (OU6). These activities are part of the Phase I RCRA Facility Investigation and Remedial Investigation (RFI/RI) for each OU. Both OUs consist of potentially-contaminated surface water, stream and pond sediments, and soil. Radionuclides, metals, inorganic compounds, and organic compounds from adjacent IHSSs may have seeped into the Woman and/or Walnut Creek drainages.



OU5 (Woman Creek drainage) comprises ten IHSSs, including:

- the original landfill, an area previously used to dispose of general RFP waste;
- an incinerator used for RFP office and dumpster wastes;
- the ash pits that received incinerator residues;
- a former concrete wash pad where uncured concrete for RFP construction was deposited and where concrete delivery trucks were washed. (Incinerator ash may also have been deposited on the concrete wash pads);
- the C-Series detention ponds; and
- several areas of surficial soil disturbance.

OU6 (Walnut Creek drainage) comprises 21 IHSSs, including:

- the A- and B-Series detention ponds;
- spray fields, where water was sprayed to hasten its evaporation;
- an old outfall, where Building 771 laundry waste water and floor drain water was discharged into open surface drainage;
- trenches that held excess sludge from the sewage treatment plant; and
- a soil dump used to contain excavated soil.

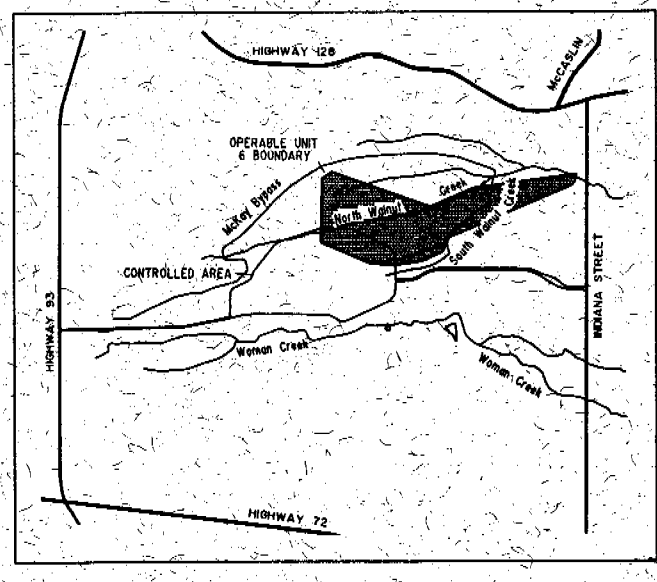
The majority of these OU5 and OU6 IHSSs are inactive and have not supported plant functions since approximately 1968. Only a few limited investigations have been conducted at these IHSSs.

Based on data from preliminary investigations, the following objectives for both the OU5 and OU6 Phase I RFI/RIs were identified:

- Characterize the physical and hydrogeologic setting of the IHSSs;
- Assess the presence or absence of contamination at the sites;
- Characterize the nature and extent of contamination at the sites, if present;
- Support a Phase I Baseline Risk Assessment and Environmental Evaluation.

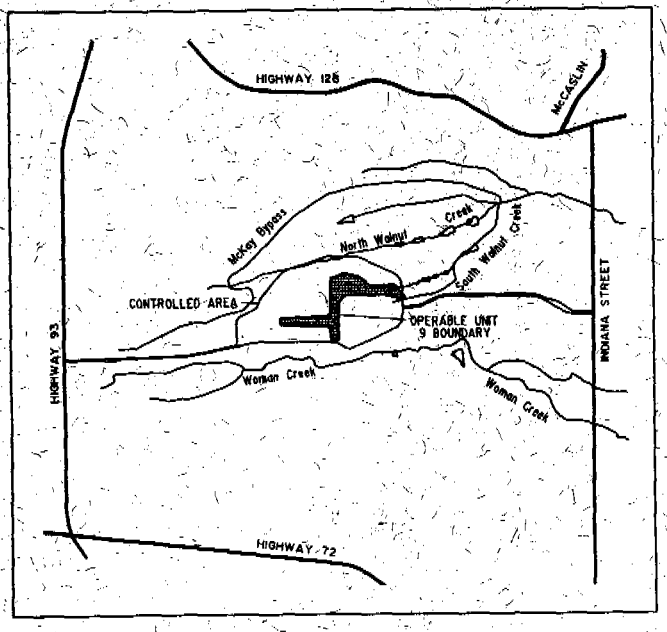
Within these broad objectives, site-specific data needs have been identified based on specific contaminants potentially present at each IHSS and the data needs for the Phase I Baseline Risk Assessment and Environmental Evaluation. The field sampling activities outlined in the RFI/RI Work Plans include surface water and sediment sampling, surface and subsurface soil sampling, alluvial ground water sampling, soil gas surveys, geophysical surveys, air monitoring, and radiation surveys.

The Draft Phase I RFI/RI Report for OU5 is scheduled for completion in November 1993 and the Draft Report for OU6 is scheduled for completion in August 1993. Both documents will be submitted to EPA and CDH. Details of field sampling activities are contained in the OU5 and OU6 Phase I RFI/RI Work Plans, which are available in the Reading Rooms listed on page 6. ■



OU9 Original Process Waste Lines

Operable Unit 9 (OU9) consists of a 35,000-foot network of underground pipes and tanks extending throughout much of the RFP main production complex. This pipeline network, called the Original Process Waste Lines (OPWL), was used to transfer wastes generated during operational processes from their origination point to the RFP process waste facility.



Only one IHSS was originally part of OU9, but further investigative studies at RFP prompted DOE, EPA, and CDH to agree in April 1992 to transfer 20 additional IHSSs that are part of the process waste line system from other OUs into OU9. This OU is being studied because it is believed that soils may have been affected by leaking waste transport pipes or tanks. Possible contaminants include nitrates, acids, caustics, and radionuclides.

A RCRA Facility Investigation/ Remedial Investigation (RFI/RI) Phase I Work Plan, designed to investigate areas close to existing and already-removed OPWL pipelines and tanks, was also approved by CDH and EPA in April 1992. Field work will begin in late 1992 and will include soil borings and test pits to further identify sources and extent of soil contamination.

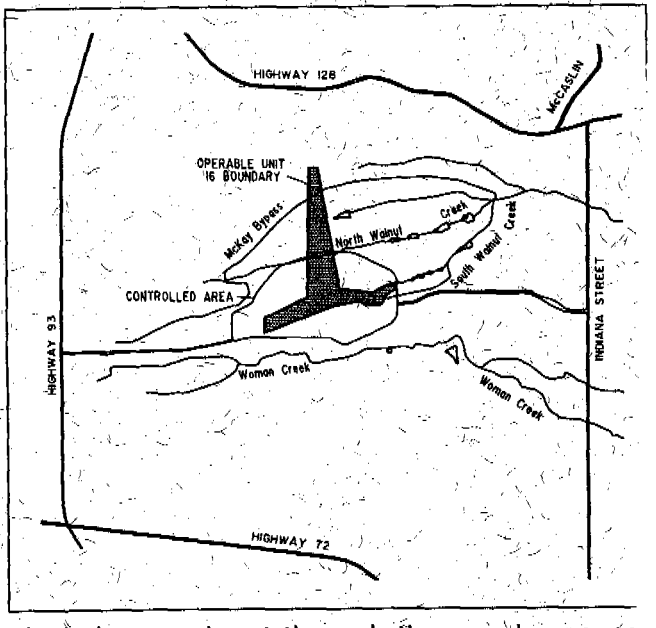
A subsequent Phase II RFI/RI will investigate the nature and extent of surface water, ground water, and air contamination, and evaluate potential contaminant migration.

The original OPWL system began operating in 1952, and additions were made to the system through 1975. It was replaced over the 1975 – 1983 period by a process waste system that can be easily inspected. Some tanks and pipelines from the original system were incorporated into the new process waste system. ■

OU16 Low-Priority Sites

Operable Unit 16 (OU16) covers miscellaneous leak and waste treatment areas located around RFP that are considered the least likely to cause health or environmental problems. OU16 contains seven IHSSs that were grouped together in the IAG because of the likelihood that previous response actions or natural environmental processes at these areas had already eliminated the need for further action. In accordance with EPA guidance, No Further Action is appropriate at sites where such processes have mitigated risk to human health and the environment. Because such actions have occurred at six of the OU16 IHSSs, DOE has proposed to take no further action at these sites. DOE submitted a "No Further Action Justification" document to EPA and CDH on July 30,1992, as required by the IAG. However, because neither EPA nor CDH has approved the document, it is being revised and will be resubmitted on October 16, 1992. DOE concluded that five of the seven IHSSs in OU16 will not require further remediation. The remaining two IHSSs will require further action but will be investigated as parts of other OUs.

The No Further Action Justification document for OU16 describes the site history, geology, hydrogeology, climatology, and current and possible future land use to characterize OU16. Each IHSS, its spill history, potential contamination, and remedial action, if one was performed, is described. Also described is a site conceptual model for OU16 that includes contaminant sources, release mechanisms, transport pathways, exposure routes, and receptors. This type of model is used to evaluate the amount, if any, of risk to human health or the environment.



The document also includes a proposal for what IHSSs should be further investigated. (See above article, "What's an RFI/RI?")

Once EPA and CDH have approved the No Further Action Justification document, DOE will encourage public input through the usual process including a public information meeting, public comment meeting, and public comment period. ■

New Documents

- OU9 Original Process Waste Lines Final Phase I RFI/RI Work Plan
- RCRA Permit Modification Request No. 9
- Phase I RFI/RI Work Plan for Operable Unit 9, Original Process Waste Lines
- Health and Safety Plan for RFI/RI at Operable Unit 3
- Environmental Restoration Program Monthly Report for June 1992
- Environmental Restoration Program Monthly Report for July 1992
- Rocky Flats Transition Plan Report to Congress
- State RCRA Permit Modification for Waste System Evaporator Project Phase I
- Supporting Information for the State RCRA Permit Modification for Waste System Evaporator Project Phase I
- EMD Administrative Procedure Manual
- Health and Safety OU1
- Work Plan OU1/Startup O&M of the IM/IRAP for the 881 Hillside
- Work Plan OU4, Volume I
- Final Subsurface Interim Measures/Interim Remedial Action Plan/Environmental Assessment and Decision Document for Operable Unit No. 2, Volume I and II
- Responsiveness Summary for the Final Subsurface Interim Measures/Interim Remedial Action Plan and Decision Document for the 903 Pad, Mound, and East Trenches Areas for Operable Unit No. 2

Calendar of Events

Quarterly Environmental Restoration Public Information Meeting and Plant Tour:
October 8, 1992, 5:00 p.m. to 8:00 p.m. at the Rocky Flats Plant, Building 60.

General Rocky Flats Plant Tours:
October 12 and November 9, 1992. Please call 303-966-4261 one week in advance for reservations.

Colorado Council on Rocky Flats Meeting (Tentative):
October 27 and November 24, 1992, 7:00 p.m. Please call the Council to verify meeting date and location at 303-232-1966.

DOE Requests Permit Modification No. 9

DOE is requesting a Class 3 modification to its current RCRA Part B permit for additional hazardous waste tank storage and treatment. Class 3 modifications are changes that substantially alter the facility or its operations. The modification must undergo public comment and be approved by the Colorado Department of Health (CDH).

This permit modification would upgrade a portion of the existing liquid process waste treatment facility at the Rocky Flats Plant, Building 374. The proposed upgrade would consist of the addition of a thin-film evaporator and a salt immobilization system, including associated feed storage tanks. This equipment would concentrate and immobilize the low-level mixed waste. The new equipment would provide increased capacity and improved capability for waste evaporation and immobilization.

A 60-day comment period for the permit modification request began August 25, 1992, and ends October 23, 1992. A public information meeting to discuss this Class 3 permit modification was held on October 1, 1992. Written comments will be accepted throughout the comment period.

Please address written comments to Gary Baughman, CDH, 4210 East 11th Avenue, Denver, Colorado 80220 or call 303-331-4847. Mr. Baughman can also provide RFP's compliance history during the life of the permit. The RCRA permit modification request and supporting documents are available for review at the reading rooms listed on page 6. ■

Rocky Flats Forms Citizen Review Group

DOE and EG&G Rocky Flats have formed a Citizen Review Group (CGR) to initiate public involvement activities on the Comprehensive Treatment and Management Plan (CTMP). The CTMP is being developed to manage land disposal restricted (LDR) wastes generated over the past 40 years of operation and will help bring those wastes into compliance with today's regulations. The CTMP identifies specific LDR wastes at the plant that are covered in the Federal Facilities Compliance Agreement II, states how these wastes will be brought into compliance, and develops the milestones for those wastes that require treatment.

Comprising of participants from academia, business, government, and surrounding communities, the CRG meets regularly to review the CTMP and related technology development materials and will provide comments to DOE and EPA, who will then consider how to incorporate their suggestions. A 60-day public comment period will then be initiated, during which a public information meeting/workshop will be conducted to fully explain LDR wastes and the CTMP. ■

Public Invited to Use Reading Rooms

The following reading rooms contain current information, technical reports, and reference documents on environmental restoration at the Rocky Flats Plant:

Rocky Flats Environmental Monitoring Council*
1536 Cole Boulevard, Suite 325
Denver West Office Park, Building 4
Golden, Colorado 80401
303-232-1966
Hours:
Monday – Friday 8:30 a.m. – 5:00 p.m.

EPA Superfund Records Center*
999 18th Street, Suite 500
Denver, Colorado 80202-2405
303-293-1807
Hours:
Monday – Friday 8:00 a.m. – 4:30 p.m.

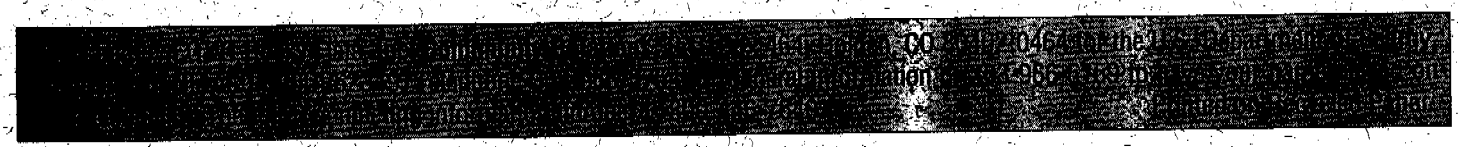
Colorado Department of Health*
Rocky Flats Program Unit
4210 East 11th Avenue, Room 420
Denver, Colorado 80220
303-331-4855
Hours:
Monday – Friday 8:00 a.m. – 5:00 p.m.

Rocky Flats Public Reading Room*
Front Range Community College Library
3645 West 112th Avenue
Level B, Center of Building
Westminster, Colorado 80030
303-469-4435
Hours:
Monday – Tuesday 12:00 p.m. – 8:00 p.m.
Wednesday 11:00 a.m. – 4:00 p.m.
Thursday – Friday 8:00 a.m. – 4:00 p.m.

Standley Lake Library
8485 Kipling Street
Arvada, Colorado 80005
303-423-4600
Hours:
Monday – Friday 10:00 a.m. – 9:00 p.m.
Friday – Saturday 10:00 a.m. – 5:00 p.m.
Sunday 12:00 p.m. – 5:00 p.m.

United States Department of Energy
Freedom of Information and Privacy Branch Office
1000 Independence Avenue, S.W.
Washington, D.C. 20585
202-586-6025
Hours:
Monday – Friday 9:00 a.m. – 4:00 p.m. (Eastern time zone)

*Information Repository



EG&G Rocky Flats, Inc.
P.O. Box 464
Golden, CO 80402-0464

First Class Mail
US Postage
PAID
Denver, CO
Permit No. 162